

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION**

DIANE COWAN, et al.

PLAINTIFFS

and

UNITED STATES OF AMERICA

PLAINTIFF-INTERVENOR

v.

**Civil Action No. 2:65-CV-00031-GHD
(previously DC 6531-K)**

BOLIVAR COUNTY BOARD OF EDUCATION, et al.

DEFENDANTS

AFFIDAVIT OF DR. JACQUELYN THIGPEN

STATE OF MISSISSIPPI
COUNTY OF BOLIVAR

Personally appeared before the undersigned authority in and for the aforesaid state and county, Dr. Jacquelyn Thigpen, who after being by me first duly sworn states as follows:

1. I am Superintendent of the Cleveland School District (the "District") and have served in this position since May, 2007. As Superintendent, I have knowledge of the operations of the District and have knowledge and information as to the facts to which I testify in this Affidavit.

2. The Court has asked for an updated timeline for implementation of the plans submitted by the District. I will address each plan in turn:

I. Judge Davidson's Open Enrollment Plan

This plan is the existing plan under which the District operates. It can be

implemented immediately.

II. District's Plan A

Middle School/Junior High

Plan A involves the continuation of the STAR program at Margaret Green Junior High and monitoring of D.M. Smith Middle School until the end of the School Improvement Grant cycle, set to end in the 2016-2017 school year. Plan A for the junior high/middle school continues open enrollment at both Margaret Green Junior High and D.M. Smith Middle School. Plan A for the middle schools does not involve any major structural or educational changes for the District and can be implemented in August, 2016 for the 2016-17 school year.

High Schools

Plan A for the high schools involves the continuation of the IB program at East Side High and the formation of the Early College Program, also at East Side High. Under Plan A, open enrollment continues for the two high schools, Cleveland High and East Side High. No major structural or educational changes are involved. The District can implement Plan A for the high schools in August, 2016, for the 2016-17 school year.

III. District's Plan B

Middle School/Junior High

Under Plan B, the District proposed closing D.M. Smith Middle School and adding a wing of classrooms to Margaret Green Junior High to accommodate the approximately 250 additional students assigned to that campus. The District also proposes

designing a STEM curriculum with arts partners at the newly expanded Margaret Green Junior High. The empty D.M. Smith building would become the campus for its neighbor school Cypress Parks Elementary, which currently operates under an “open concept” design. Because of the construction and curriculum design necessary to implement Plan B, the District needs until August, 2017 to launch Plan B. This August, 2017 start time is the timeline proposed initially by the District in its January 23, 2015 plan. The District believes the August, 2017 deadline remains realistic and manageable. Assuming this Court ordered implementation of Plan B as of October, 2015, the District would have approximately twenty-one (21) months to finalize designs for the addition to Margaret Green, design the STEM program for Margaret Green, and complete construction of the new wing at Margaret Green.

High Schools

District Plan B for the high schools calls for all high school students being assigned to East Side High, which will house the IB curriculum and Early College Program. After this re-assignment, students interested in a newly designed STEM curriculum at Cleveland High may apply for entrance to that school. In its original proposal to the Court, the District envisioned a high school enrollment process that would begin in November, 2015 and end in February, 2016. The District originally proposed implementation of Plan B for the high schools in August, 2016. However, assuming an Order adopting Plan B were entered in October, 2015, it would be very difficult to successfully implement Plan B’s enrollment process and design Plan B’s STEM curriculum in time for an effective start to the 2016-2017 school year. The District

requests an August, 2017 start date for the implementation of Plan B for the high schools.

IV. District's Plan C

Junior High/Middle School

Just prior to the May 2015 hearing, after extensive negotiations with the Government, the District proposed a third plan, or Plan C. Plan C for the middle schools is identical to Plan B, i.e., closing D.M. Smith and moving all D.M. Smith students to an expanded Margaret Green campus. Like Plan B for the middle school/junior high, the District requests an August, 2017 start time for Plan C for the middle school/junior high.

High Schools

Plan C calls for keeping two high schools in the District, but setting student schedules such that each student would spend half of their class time at one high school campus and the other half of their class time at a different high school campus. Students would enroll at either Cleveland High or East Side High (the "home" school) their ninth grade year, but would then be combined into various classes, depending on their interests and schedules. Plan C calls for placing certain curriculum only at one campus and not at the other and putting students on a block schedule to eliminate bussing during the school day. Under Plan C, a typical student may spend Monday/Wednesday/Friday at East Side taking math and science courses and Tuesday/Thursday at Cleveland High taking English and history classes. Plan C involves no new construction and does not call for re-writing curriculum, only adjusting schedules and teacher placement. The District could implement Plan C for the high schools in August, 2016.

Further, affiant sayeth not.

This the 29 day of October, 2015.

Jacquelyn C. Thigpen
DR. JACQUELYN THIGPEN

SWORN TO AND SUBSCRIBED before me this the 29th day of
October, 2015.

Melissa Lott
NOTARY PUBLIC

March 16, 2018
My Commission Expires:

